

REMARKS

Claims 20-32 are pending in this application, claims 1-19 having previously been canceled. By this Amendment, claims 20, 23, 28 and 32 are amended. These amendments introduce no new matter as they serve only to better clarify the language recited in the claims to overcome certain informalities, or are made for consistency. Claims 33-44 are canceled without prejudice to, or disclaimer of, the subject matter recited in those claims.

Reconsideration of the application based on the above amendments and the following remarks is respectfully requested.

Applicants appreciate the courtesies shown to Applicants' representative by Examiner LeRoux in the January 21, 2005 personal interview. Applicants' separate record of the substance of the personal interview is incorporated into the following remarks.

The Office Action, on pages 2 and 3, rejects claims 20-44 under 35 U.S.C. §112, second paragraph, as being indefinite. Specifically, the Office Action asserts that claim 20 recites, in places, "a plurality of optical modulation devices" and, in other places, recites "the optical modulation device." Claim 20 is amended in order to better clarify the language recited in that claim regarding the plurality of optical modulation devices.

The Office Action, on page 3, additionally rejects claim 20 under 35 U.S.C. §112, second paragraph, as being incomplete for omitting essential elements, i.e., an intermediate frame plate. Applicants respectfully submit that use of the term comprising leaves the features recited in claim 20 open ended. The intermediate frame plate is not a required element, but may be included in the structure.

Applicants' representative discussed these arguments with Examiner LeRoux in the January 21 personal interview. The Examiner agreed that "Applicant's proposed amendments will most likely resolve the 35 USC 112 second paragraph rejection...."

Accordingly, reconsideration and withdrawal of the rejection of claims 20-32 under 35 U.S.C. §112, second paragraph, are respectfully requested.

The Office Action, on pages 4-7, rejects claims 20, 21, 23, 28, 29 and 32 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,982,538 to Shikama et al. (hereinafter "Shikama") and further in view of U.S. Patent No. 5,651,599 to Fujimori et al. (hereinafter "Fujimori"). This rejection is respectfully traversed.

Shikama teaches a stereoscopic image projector having a light valve controlled by two image signals, the light valve producing a polarized raster image in which some rasters are modulated by the first image signal and other rasters by the second image signal (Abstract). Shikama fails to teach or suggest any particular manner or positioning of any mounting frames as part of the disclosed apparatus and structure.

Claim 20 recites, among other features, a plurality of fixed frame plates in a fixed contact with each light incident surface of the prism; and a plurality of mounting frame plates that hold the optical modulation device and the transparent plate, each mounting frame plate being detachably fixed to each fixed frame plate.

Applicants respectfully submit that Shikama cannot be reasonably read to teach, or even to have suggested, a plurality of fixed frame plates in a fixed contact with each light incident surface of the prism, nor a plurality of mounting frame plates that hold at least one of the plurality of optical modulation devices or at least one of the plurality of optical modulation devices and transparent plates, as are recited in at least independent claim 20.¹ Further, Applicants respectfully submit that Fujimori does not teach, nor would it have

¹ The Office Action acknowledges that Shikama does not disclose "mounting frame plates," but asserts that Shikama discloses "fixed frame plates" in Fig. 1. Applicants disagree that Fig. 1 discloses "fixed frame plates" as claimed. Should the Examiner repeat this assertion, Applicants request a thorough explanation as to how Fig. 1 is believed to disclose this feature.

suggested, a plurality of fixed frame plates in a fixed contact with each light incident surface of a prism because Fujimori does not even include a prism.

Thus, Applicants respectfully submit that neither Shikama nor Fujimori, nor the combination of the two, can reasonably be read to teach, or even to have suggested, the structure of the fixed frame plates and mounting frames as specifically recited in at least independent claim 20. As such, Applicants respectfully submit that the combination of all of the features recited in at least independent claim 20 are neither taught, nor would they have been suggested, by the combination of the applied references. Further, Applicants respectfully submit that dependent claims 21, 23, 28, 29 and 32 are also neither taught, nor would they have been suggested, by the combination of the applied references for at least the respective dependence of these claims on independent claim 20, as well as for the separately patentable subject matter which each of these claims recites.

Accordingly, reconsideration and withdrawal of the rejection of claims 20, 21, 23, 28, 29 and 32 under 35 U.S.C. §103(a) as being unpatentable over the combination of the applied references are respectfully requested.

The Office Action, on pages 7-18, varyingly rejects claims 22, 24-27, 30, 31 and 33-44 under 35 U.S.C. §103(a) as being unpatentable over the combination of Shikama and Fujimori in various combinations with U.S. Patents Nos. 3,910,682 to Arai et al., 4,715,686 to Iwashita et al., 5,508,834 to Yamada et al., 5,399,850 to Nagatani et al., 5,806,950 to Gale et al., and 6,007,205 to Fujimori. The cancellation of claims 33-44 renders the rejection moot as to these claims. Regarding the rejections of claims 22, 24-27, 30 and 31, these rejections are respectfully traversed.

Applicants respectfully submit that none of the additionally applied references disclose or suggest a combination of fixed frame plates and mounting frame plates as is specifically recited in independent claim 20. As such, none of these references overcome the

shortfalls in the application of Shikama and/or Fujimori to at least independent claim 20.

Applicants, therefore, respectfully submit that each of dependent claims 22, 24-27, 30 and 31 are neither anticipated, nor would they have been suggested, by the combinations of the applied references for at least the respective dependence of these claims on independent claim 20, as well as for the patentably distinct subject matter which each of these claims recites.

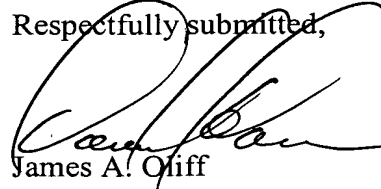
Accordingly, reconsideration and withdrawal of the rejections of claims 22, 24-27, 30 and 31 under 35 U.S.C. §103(a) as being unpatentable over the varying combinations of applied references are respectfully requested.

Applicants' representative presented arguments in traversal of the prior art rejections of the Office Action to Examiner LeRoux during the January 21 personal interview. Examiner LeRoux was not persuaded by the arguments presented by Applicants' representative and suggested that the arguments needed to focus more broadly on all of the features recited in the claims. As such, Applicants argue a more complete recitation of all of the features recited in at least independent claim 20 which Applicants feel adequately distinguish the subject matter of all of the pending claims over the applied prior art.

In view of the foregoing, Applicants respectfully submit that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 20-32 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the telephone number set forth below.

Respectfully submitted,



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Date: February 28, 2005

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